

**DEP Permit # E15-862  
DEP Permit HDD Reference # PA-CH-0138.0000-RD  
DEP HDD # S3-0331  
Township – Uwchlan  
County - Chester  
HDD Site Name – Eagleview Boulevard Crossing**

**1<sup>st</sup> Public Comment Period**

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**1. Comment**

The Department of Environmental Protection's mission is to protect Pennsylvania's air, land and water from pollution and to provide for the health and safety of its citizens through a cleaner environment. Sunoco/Energy Transfer has well over 100 Notices of Violation by the DEP and hundreds of spills of drilling mud.

It is clear that this dangerous pipeline cannot be completely safely and without harm to our environment. I urge the DEP to stand by its mission statement and deny any new permits at this site or for the Mariner East project. Enough is enough. (1)

**2. Comment**

The potential danger to my neighborhood. is very distressing. The Eagleview Blvd ID S3-3301. Not only is this an area of business and retail, but over 1,000 homes. If an accident were to occur, it would be devastating. Please stop this project. (2)

**3. Comment**

I am writing about the permit request regarding horizontal directional drill analysis. Eagleview Boulevard Crossing, PADEP Section 105 Permit No.: E15-862, PA-CH-0138.0000-RD (SPLP HDD No. S3-0331).

A report for the Eagleview Blvd Crossing states: A Pennsylvania Groundwater Information System web site (PaGWIS) search identified 21 domestic wells within one mile of HDD S3-0331.

We know that Sunoco/ET has already damaged aquifers and thus the private wells of residents in West Whhiteland and were ordered to stop drilling there. Clean water is a basic necessity. Without clean water, we are no better than developing countries on other continents. We also know that Sunoco has not self reported any damage they have caused; it was citizens who reported. Sunoco cannot be trusted. The damage forced the homeowners to accept Aqua's public water managed by Sunoco which owns 51% of Aqua. This is an apparent conflict of interest.

Sunoco refuses to release any information to our first responders. Thus, we cannot create an emergency plan without additional info. Sunoco's advice to run is not sufficient. Run! is the advice seen in first grade reading books, not for a plan that would require the evacuation of 10,000 to 19,000 residents in the local townships in Chester County. There are people who are physically disabled, young children, and pets who cannot be evacuated so quickly.

The latest explosion from the Philadelphia plant illustrates that these gasses are not harmless, as Sunoco would have us believe. The pipelines going through Chester County and the purpose of Permit E15-862 is to carry the same dangerous gasses (ethane, propane) that caused the explosion. You cannot conscientiously issue a permit to Sunoco to build this dangerous pipeline without Sunoco providing the public and first responders a hazard plan. Residents' lives cannot be collateral damage for the cost of doing business. We are not a risk statistic to be gambled with. For these reasons, I ask you to deny the permit. For the safety of all residents in PA. (3)

**4. Comment**

The residential and commercial properties as well as thousands of people working and playing in this area will be threatened. Stop this project. (4)

**5. Comment**

The DEP has a duty to a concentrated effort to reduce chemical hazards and toxic pollution. This re-evaluation is fundamentally flawed and inadequate. The

fundamental question is: will there be an adequate PPC to reduce NGL hazards that endanger communities - whether from criminal activity or accidents - or will there not be? This is the timely question this re-eval did not touch on. The terrorist attacks of September 11 and accidents like the recent PES refinery incident show plainly that chemical Facilities, like pipelines, could suffer a worst-case fire or toxic gas release. It is irresponsible and risks a catastrophe for the pipeline industry to claim that a worst-case release is too improbable to occur therefore does not need to be prepared for. Yet, this pipeline was allowed to be approved by the DEP through high consequence areas like, Eagleview Boulevard Crossing PADEP Section 105 Permit No. E15-862 PA-CH-0138.0000-RD, (SPLP HDD No. S3-0331).

Under the National Security Act, the U.S. Environmental Protection Agency has requirements to report and reduce hazard reduction. This is done via state reporting. There are hazard reporting and reduction requirements by the state of PA as well like the Stanford Act to ensure our FEMA partners are aware of risks facing the Commonwealth so they are prepared to aid the public should a pipeline emergency event occur. The DEP being the only agency to approve the Sunoco Pipeline Project special attention, regard and reporting should have taken place including attention to the Sunoco Pipeline PPC plan. The permit for re-evaluation should not be approved until the Sunoco PPC reflects the actual Guidelines for the Development and Implementation of Environmental Emergency Response Plans. Plans should be developed by Sunoco; and approved by the DEP in conjunction with PEMA that meet or exceed the PPC guidelines. Here are the guidelines.

<https://www.dep.pa.gov/Business/Water/Waterways/Documents/400-2200-001.pdf>

No longer can the state of PA and the PA DEP neglect its duty to review chemical security practices and to recommend ways of reducing vulnerabilities. No longer can the DEP impede public information about dangerous pipelines by allowing the operator to not comply with the Community and Worker Right to Know Act.

This PPC plan,

<http://files.dep.state.pa.us/ProgramIntegration/PA%20Pipeline%20Portal/MarinerEastII/Berks/12%20-%20E&S%20Plan/Tab%2012A%20-%20PPC/PPP%20PPC%20Plan%20111416%20FINAL.pdf>; takes no obvious steps

to eliminate and reduce those dangers associated with NGL's. No longer can any state agency seriously propose that voluntary local programs are sufficient to fix the problem. DEP has an opportunity and a duty to fill a big hole in our laws by requiring Sunoco to evaluate safer alternatives and use them wherever practicable, like, with this evaluation. The PPC proposes no constructive steps towards catastrophe prevention from a chemical release near our public spaces, schools and vulnerable residential communities. The PPC does not give local government the tools it needs to protect communities and first responders from the actual hazards that Mariner East represents. There is a big hole in our Title 35 public safety laws and the PPC could play a huge role in helping to secure these rights for the more than 8,000 people living in Uwchlan Township having their rights to defend life and property denied since 2014. The PPC should be created by actively performing a hazard and

environmental study. The vulnerability zones that this hazardous pipeline facility imposes on the surrounding community (in terms of size, intensity, or population at risk) should be made clear. The DEP is the only state agency meant to evaluate if there is a safer alternative for the PPC and the route in this regard.

Please include in the PPC what specific terrorism specific planning element in the Risk Management Program as established by the Clean Air Act have been identified. Please include in the PPC any federal compliance plans that systematically encourages inherently safer alternatives at facilities in this area that could suddenly release dangerous chemical plumes into surrounding communities.

As a result, of this inadequate PPC thousands of Chester County residents live with a chemical hazard; with a potential for mass destruction, that is not planned or mitigated for.

Chemical site security is below standard as evident by Uwchlan Township, Chester County and Downingtown Area School District current litigation at the PUC asking for both prevention and mitigation plans be developed that the PPC would provide for, if, it was conducted with rigor and a commitment to safety. The PUC cases indicate and show serious security problems at pipeline facilities in the region of this Evaluation; including 3 schools with over 3,500 students and staff located near the facilities and the busiest intersection in the County of Chester. In addition, the DEP is apparently ignoring these requirements as they believe that 105 and 106 permits is limited to protecting water ways and erosion however PPC plans are part of the permitting process and the people of Chester County are entitled to robust plans for health and environment. DEP should make sure that Sunoco produces this review and creates recommendations and guidelines that are reasonable and adequate; not, reckless and haphazard. The PPC is ripe for charges of risking a catastrophe. This current effort at a PPC lacks a public docket. It uses an "unacceptable risk" methodology that does not consult people or environmental resources at risk in surrounding communities. The Department has also not directly addressed detailed concerns raised by residents and political subdivisions regarding environmental safety. (5)

## **6. Comment**

The people have a right to clean air, pure water, and to the preservation of the natural, scenic, historic and aesthetic values of the environment. Pennsylvania's public natural resources are the common property of all the people, including generations yet to come. The mariner east pipeline construction has continued to devastate Pennsylvania landscape for the past few years. It is time to shut it down preserve our environment before it's too late. I not only oppose any drilling or trenching for the Mariner East pipelines but furthermore insist this project needs to be stopped permanently. This has been over 90 inadvertent returns from HDD already and several sinkholes. Permits for any fossil fuel projects are a risk to climate change and Pennsylvania has been contributing for far too long. It's time for renewable energy to prosper in Pennsylvania.

To protect Pennsylvania's air, land and water from pollution and to provide for the health and safety of its citizens through a cleaner environment. This is the motto of the department of environmental protections, it's time to start doing what you're supposed to be doing. Please deny all permits pertaining to the Mariners pipelines, at least until the criminal charges have been processed, to remove all accountable corrupt officials. (6)

## **7. Comment**

Please accept the following comments in response to the reanalysis of the HDD installation of a 20-inch pipeline that traverses Eagleview Boulevard in Uwchlan Township, Chester County, Pennsylvania submitted by Sunoco Pipeline, L.P. for DEP Permit number E15-862, HDD Reference number PA-CH-0256-0000-RR filed on June 25, 2019.

Following my review of this report, I have several significant concerns related to the stated environmental, safety, and quality of life impacts for citizens in Uwchlan Township (Chester County).

Sunoco was required to reanalyze the use of HDD in this area following two inadvertent returns (IRs) during the pilot phase drilling for a 16-inch pipe installation. This reanalysis was required by Condition No. 3 of a Stipulated Order issued under Environmental Hearing Board Docket No. 2017-009-L.

The two IR events which triggered the reanalysis are called "punch out" IRs in the drilling industry. Such incidents occur because of geological weaknesses, such as weak, fractured, highly weathered bedrock, resulting in natural fractures or fissures, not because of operational techniques. The root cause of the IR is weak rock structure and inadequate overburden strength above the drilling tool, despite operated at normal drilling fluid pressure to maintain return flows. This results in the unintended transfer or spewing of drilling mud to the surface, presenting negative environmental consequences.

Thoroughly researched geologic studies can help identify such weaknesses, but it seems that geologic assessment for this region failed to capture such locations, leaving both environmental and public safety at risk of irreversible harm. I am greatly concerned with the potential environmental impacts that accompany the continued use of HDD and other installation methods in areas with inadequate geologic assessments, as well as the harmful effects of the pipeline installation and operation on the community.

One of my primary concerns deals with the possible destruction of private wells and the contamination of groundwater that can result because of IR incidents. Just over a month ago, in Chester County, at the Exton Bypass Crossing, Sunoco failed to correctly identify all the affected wells in the area, resulting in a private well becoming unusable due to contamination. In this case, at the Eagleview Boulevard

Crossing, one private water supply well was identified within 450 feet of the originally permitted HDD profile. This landowner will continue to have his water sampled during and after the construction process, but there is no contingency plan other than “temporary water assistance” that is in place should something catastrophic occur. This is just one of many examples where Sunoco planned for the best-case scenario, rather than the worst. Furthermore, 21 domestic wells were identified within one mile of the planned pipeline, and groundwater was encountered in one of the four geotechnical test borings described in the Hydrogeologic Report, Section 2.2.8, provided in Attachment 1. Another recurring trend with Sunoco work: careless, rushed, “corner-cutting” efforts to complete projects fast, not safely.

Finally, I am concerned with the effects of both the construction process and future operations will have on the community located around the pipeline. Referring to the topographic map in Figure 1 on page 2 of Section 2, this is a highly commercialized area. There is a middle school, an urgent care, multiple lodging locations, and over ten restaurants. Construction and operation of a pipeline transporting highly volatile natural gas liquids (NGL) in such a densely populated area is simply dangerous and an example of how current laws and regulations serve to protect the oil and gas industry, leaving citizens at severe risk of harm and death.

It is my strong recommendation that the Department place a hold on the construction of the pipeline prior to a public comment process so that the citizens and landowners in the region have an area to adequately address their concerns. I also request that before any further construction of any kind is approved or reauthorized, that an additional geologic assessment be conducted to determine if this project is routed in the path of least destruction. Lastly, this project and any other connecting pipeline, should be shut down until a truly individualized and thorough emergency action plan is not only produced and shared with emergency responders, but is also adequately communicated with the public, including mock drills to ensure safety and compliance. Considering the lengthy history of hundreds of violations because of careless, expedited project pace compared to industry norms, and numerous explosions and hazardous accidents, intense oversight and reassessment of any of Sunoco or its affiliates’ projects are beyond justified. (7)

#### **8. Comment**

DEP has to reduce chemical hazards and toxic pollution. This re-evaluation is inadequate. There has not been an adequate PPC to reduce NGL hazards. The Mariner Pipeline Is risking a catastrophe.

This pipeline should never have been approved by the DEP through high consequence areas like, Eagleview Boulevard Crossing PADEP Section 105 Permit No. E15-862 PA-CH-0138.0000-RD (SPLP HDD No. S3-0331).

The National Security Act under the U.S. Environmental Protection Agency has requirements to report and reduce hazard reduction. This is done via state reporting. The DEP was the only agency to approve the Sunoco Pipeline Project special

attention. A permit for re-evaluation should not be approved until the Sunoco PPC reflects the actual Guidelines for the Development and Implementation of Environmental Emergency Response Plans. Plans should be developed by Sunoco; and approved by the DEP in conjunction with PEMA that meet or exceed the PPC guidelines. Here are the guidelines.

<https://gcc01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.dep.pa.gov%2FBusiness%2FWater%2FWaterways%2FDocuments%2F400-2200-001.pdf&data=02%7C01%7Cra-eppipelines%40pa.gov%7C462df15f799547f5e03f08d704edad06%7C418e284101284dd59b6c47fc5a9a1bde%7C0%7C1%7C636983291168690481&sdata=lCu7u5I0Q0V8X3gUmA4s%2BAWmxSAs%2FH%2FnqoCyu4yJJew%3D&reserved=0>

No longer can the state of PA and the PA DEP neglect its duty to review chemical security practices and to recommend ways of reducing vulnerabilities. No longer can the DEP impede public information about dangerous pipelines by allowing the operator to not comply with the Community and Worker Right to Know Act.

This PPC plan,

<https://gcc01.safelinks.protection.outlook.com/?url=http%3A%2F%2Ffiles.dep.state.pa.us%2FProgramIntegration%2FPA%2520Pipeline%2520Portal%2FMarinerEastII%2FBerks%2F12%2520-%2520E%26S%2520Plan%2FTab%252012A%2520-%2520PPC%2FPPP%2520PPC%2520Plan%2520111416%2520FINAL.pdf&data=02%7C01%7Cra-eppipelines%40pa.gov%7C462df15f799547f5e03f08d704edad06%7C418e284101284dd59b6c47fc5a9a1bde%7C0%7C1%7C636983291168690481&sdata=zWquD%2BIJfjv%2Bp4ZStrcP3%2FIz%2FvCGuyDP1zR1DsFny8E%3D&reserved=0>; takes no obvious steps to eliminate and reduce those dangers associated with NGL's. No longer can any state agency seriously propose that voluntary local programs are sufficient to fix the problem. DEP has an opportunity and a duty to update their regulations and State laws by evaluating safer alternatives including Safety Setbacks!!!

The PPC must propose constructive steps towards catastrophe prevention from a chemical release near our public spaces, schools and vulnerable residential communities. The PPC must give local government the tools it needs to protect communities and first responders from the actual hazards that Mariner East represents. There is a big gap in our Title 35 public safety laws and the PPC must help to secure these rights for the more than 8,000 people living in Uwchlan Township! The PPC must perform a hazard and environmental study. The DEP must evaluate a safer alternative for the PPC and the route in this regard.

The PPC must include specific anti terrorism plans in the Risk Management Program as established by the Clean Air Act. Plans in the PPC must include any federal compliance plans that provide safer alternatives at facilities in this area that could release dangerous chemical releases into surrounding communities.

The current PPC puts thousands of Chester County residents who live with a chemical hazard; with a potential for mass destruction, with no realistic means to evacuate!!!

Site security is below standard as evident by Uwchlan Township, Chester County and Downingtown Area School District current litigation at the PUC asking for both prevention and mitigation plans be developed that the PPC would provide for. This highly populated area includes 3 schools with over 3,500 students and staff located near the facilities and the busiest intersection in the County of Chester. The DEP is ignoring requirements as they believe that 105 and 106 permits is limited to protecting water ways and erosion PPC plans are part of the permitting process and the people of Chester County are entitled to robust plans for health and environment. DEP must make sure that Sunoco produces this review and creates recommendations and guidelines that are reasonable and adequate. The PPC as it stands now is risking a catastrophe. This current effort of the current PPC lacks a public docket. It uses an "unacceptable risk" methodology that does not consult people or environmental resources at risk in surrounding communities. The Department must address detailed concerns raised by residents and political subdivisions regarding environmental safety. (8)

## **9. Comment**

The County of Chester hereby submits its comments to the above referenced HDD Reevaluation Report submitted by Sunoco Pipeline, L.P. Specifically the County of Chester herein submits the July 10, 2019 review comments of the County's experts McCormick Taylor. A complete copy of the McCormick Taylor July 10, 2019 review comments is attached.

The McCormick Taylor review comments are as follows:

- The Report indicates that the initial HDD for the 16-inch pipe resulted in two Inadvertent Returns (IR) and that they were remediated. The Report does not address why the first (November 20, 2017) IR occurred almost 100 feet off the bore alignment. There is a utility shown in the area of the IR. Was the integrity of this utility examined following the IR? How were the two IRs contained / remediated? The proposed alignment is closer to the location of this IR and therefore may have a similar occurrence. Have any measures been considered to address this (such as a relief well or excavation)? The report should explain how the two IRs were remediated and whether they are expected to be continued weak points during installation of the 20-inch HDD.
- The Report indicates that the Revised Horizontal Directional Drill Design includes a Design Radius of 1,800-5,000 ft. However, the updated plan sheet (dwg PA-CH-0138.0000-RD) calls out a combined Curve R=1,694 ft.

- The Report does not address either the engineering analysis that led to the Permitted alignment, nor the ongoing 16-inch pipeline alignment. It would be beneficial to compare the assumptions that have led to the proposed design change, especially due to the substantial increase in proposed depth.
- The proposed revised alignment parallels the completed 16" pipeline bore. The report does not address the possible loss of drilling fluid to the parallel bore's annular space where faults and fractures could allow flow to migrate. There is potential that this can result in unexpected IR events along the other bore's path.
- How was the depth of installation for the proposed alignment determined? The report contains no boring data to the proposed depths.
- The Best Management Practices included in the Conclusion of the report are generic. Project specific practices should be noted and employed - including specifying that monitoring reports including drilling pressures and return amounts be kept and filed with the Department; signing and sealing reports by qualified professionals; noting the frequency of reporting; specifying the pilot tool and drilling pipeline diameters; specifying the exact methods of monitoring for inadvertent returns and loss of fluid, and qualifying the specific Loss Control Materials that can be used.
- Where IRs are most likely, including entry and exit points and where previous IRs have occurred, adjacent property owner right of entry should be obtained in advance of construction to facilitate efficient containment and cleanup of IR fluids. (9-12)

Letter – [County of Chester – 7-10-19](#)

Letter – [McCormick Taylor – 7-10-19](#)

## 10. Comment

I live in Uwchlan, in Exton/Lionville area, and I shop and dine daily near the ME pipelines.

I am writing in regards to the Eagleview Blvd. Crossing of the ME pipeline. This is an example of extremely poor siting, threatening our thriving neighborhood commercial district, including restaurants and shops. The communities of dense residential development surrounding this area are at risk due to the location of the pipelines in their midst. It is so unfortunate that the corporate owners/operators were not cognizant nor caring about the environment and community of the pipeline installation. It is even more concerning that our government agencies at so many levels have failed to protect the citizens, the properties, and our environment. Please consider any measures within your purview in the location of these pipelines.

Thank you for the opportunity to voice my concern over the location of the pipelines in my community. (13)

## **11. Comment**

The continued use of HDD and other installation methods in high consequence, highly developed communities like Exton has proven time and again to be damaging, to be dangerous, and to cause irreparable harm to natural resources and private property. In my district, Energy Transfer has purchased at least one home as a result of irreparable damage they caused to the septic system for a property in Upper Uwchlan Township. The property was unable to perk following the incident, and the home now sits vacant and uninhabitable in an otherwise populated and vibrant community. On Lisa Drive in Exton, not far from the pipeline crossing in question, five homes have been purchased by Energy Transfer as a result of continued land subsidence that has resulted in sinkholes. These “inadvertent” consequences of utilizing experimental installation methods near densely populated communities are not simply an issue of property rights for one individual homeowner. These methods, and the resulting pipelines, carry potential and significant consequences for entire communities.

Vacant, poorly maintained, and unstable properties that are rendered unsafe, unsanitary, or unlivable affect the property values of every neighbor who is adjacent or nearby, leading to financial loss, diminished quality of life, and blight for entire communities.

The Mariner East project in this area presents an involuntary risk to life and property to every landowner and business owner within the impact radius. In addition to hundreds of family homes, the Eagleview Boulevard Crossing is in proximity to a middle school, an urgent care, multiple hotels and more than 10 restaurants. Energy Transfer/Sunoco Pipeline L.P., even after devastating incidents including the explosion in Beaver County that risked many lives and resulted in a home burning to the ground, continues to plan for the best-case scenario, instead of the worst-case scenario on this project. It is the responsibility of the DEP to be stewards of the land and natural resources of this Commonwealth, looking out for the common good of every community in Pennsylvania.

While Mariner East poses the opportunity for enormous profit for an out-of-state corporation and a few landowners in Southwestern PA, it presents enormous economic and environmental risk to the landowners across the 350 miles that Mariner East traverses. The Mariner East experiment has proven to be disastrous for Pennsylvania property owners, and it is time that the state of Pennsylvania holds this company accountable.

In the 45-page re-evaluation plan, nowhere are adequate solutions presented for preventing future inadvertent returns or “punchouts” during HDD. The pipeline operators are simply asking for approval to utilize the same methods of installation, in the same locations, with the same challenges, with simply the expectation that there will be problems. The DEP permits address responses to these problems, but not prevention.

Furthermore, looking at the long-term impact, with or without ignition, a leak of natural gas liquids like propane, ethane, or butane into groundwater could have a devastating effect on the public drinking water supply, public safety, and property values. There are no plans for mitigation, prevention, or clean-up of Natural Gas Liquids. Due to the unique properties of NGLs, this is not just a risk to the environment; this is risking a catastrophe, as we saw in the Revolution Pipeline explosion in Beaver County. If a rupture or leak of that magnitude were to happen in Exton, hundreds, if not thousands of lives would be at risk.

I am requesting that the Department place a hold on any further approvals on this project until a complete public risk assessment is conducted, including but not limited to a full study of all effects on public and private drinking water supply, impacts on public health from industrial operations in residential areas, and the implementation of an adequate plan for public health and safety is implemented in Chester County.

(14)

Letter – [Representative Danielle Friel Otten](#)

## 12. Comment

Pursuant to the Corrected Stipulated Order entered on EHB Docket No. 2017-009-L on August 10, 2017 (“Order”), and on behalf of Clean Air Council, Mountain Watershed Association, Inc., and the Delaware Riverkeeper Network (“Appellants”), please accept these comments on Sunoco Pipeline L.P.’s (“Sunoco”) re-evaluation report (“Report”) for the horizontal directional drilling (“HDD”) indicated by drawing number PA-CH-0138.0000-RD (the “HDD Site”).

### **1. This reevaluation is premature and incomplete because the installation of the 16- inch pipe is ongoing and has been significantly delayed without explanation.**

Drilling for the installation of the 16-inch line at the Site began prior to July 25, 2017. Two years later, that installation is still not finished. According to the Report, reaming is 74% complete. The extreme delay in the construction at this Site warrants thorough analysis and should be central to this reevaluation. Yet Sunoco barely acknowledges the delay. The Hydrogeologic Reevaluation Report (“HRR”) asserts “relatively few issues with LOCs and IRs” have occurred at the Site. While the Report does describe the rate of drilling as being slow, it seems unlikely that could explain a two-year delay either. It is critical that Sunoco fill in the gaps in this story. Without a thorough analysis of what happened – and is happening – with the construction of the 16-inch HDD, this reevaluation is incomplete and premature. Such an analysis is the starting point for understanding how to prevent similar problems, whatever they may be, during the installation of the 20-inch line. Moreover, residents and the Department alike need to be informed about how long drilling for the 20-inch line will take. Sunoco probably has not prepared anyone for another year or two of drilling operations at the Site. The long-term nature of the construction at the Site may be a threat to residents and the environment.

## **2. Sunoco has conducted insufficient geotechnical surveying.**

Sunoco conducted multiple test bores in the vicinity of the Site. The first series of test bores met auger refusal at very shallow depths, ranging from just 10 feet to 30 ft bgs. One subsequent test bore was drilled deeper, to 80 ft bgs. Sunoco is proposing to run the 20-inch line up to 153 ft bgs. It does not appear Sunoco has any site-specific data regarding the rock at this depth. The HRR admits, however, that deeper bores in similar rock revealed weathering that exceeded 100 feet of depth. While Sunoco references its drilling experience with the 16-inch line, it does not provide any of the data. Without such data, it remains unclear why Sunoco has chosen to run the 20-inch HDD at the specific depth it is proposing. The Department should require Sunoco to disclose all relevant data for this Site and to conduct additional testing as necessary. The Department should also require Sunoco to justify the depth of its redesigned profile by contrasting it with the possibility of drilling at other depths. This analysis should include a discussion of any challenges that may arise related to steering at Sunoco's chosen profile depth. Drilling through gneiss has proven problematic for steering at other sites and that challenge could be compounded by the length of the proposed profile.

## **3. Sunoco does not have plans for managing groundwater discharge.**

The HRR points out that "Although the risk of a groundwater discharge at either entry/exit is small, the drilling contractor should be prepared to manage this type of discharge." The Report does not include any such plans. The Department should ensure that Sunoco has site-specific plans for handling possible groundwater discharge. especially important given the high number of structures and utilities in the vicinity of the Site that could potentially be damaged by the discharge.

Thank you for considering these comments. Please keep Appellants apprised of any next steps. (15-19)

Letter – [Clean Air Council – 7-10-19](#)